

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOB CREATORS NETWORK,)	
)	
Plaintiff,)	
)	Case No. 1:21-CV-4818-VEC
v.)	
)	
OFFICE OF THE COMMISSIONER OF)	
BASEBALL d/b/a MAJOR LEAGUE)	
BASEBALL, et al.,)	
)	
Defendants.)	
)	

**NOTICE OF MOTION FOR LEAVE TO FILE BRIEF
AS *AMICI CURIAE* IN SUPPORT OF PLAINTIFF**

Proposed *Amici Curiae* Edwin Meese III and the American Constitutional Rights Union, through the undersigned counsel, and pursuant to Local Civil Rule 7.1, hereby respectfully move this honorable Court for leave to file the attached brief as *amici curiae* supporting the Plaintiff's Motion for Preliminary Injunction in the above-captioned manner. Plaintiff has consented to the filing of this brief. Defendants Major League Baseball and Commissioner Manfred take no position on the filing of this brief. And as of the time of this filing, counsel for Defendant Major League Baseball Players Association has not responded to amici's request for consent to file the brief. In support of this motion, and pursuant to Local Civil Rule 7.1(a), movant attaches the proposed *amici curiae* brief and a proposed order, and is contemporaneously filing a memorandum in support of this motion.

Respectfully Submitted,

KRISTINA S. HEUSER, P.C.

By: /S/

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June 7, 2021

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of June 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which I understand to have caused service on all counsel of record.

KRISTINA S. HEUSER, P.C.

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